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*Attorneys for Defendants Benjamin F. Daniels,
Mark W. Schuler, Alton O. Parker, B & B
Investment Group, LLC, and BW Holdings,
LLC d/b/a the “FAIR Project”*

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING, INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah

**PETITION FOR ATTORNEYS FEES
AND COSTS FOR DEFENDANTS
BENJAMIN F. DANIELS, MARK W.
SCHULER, ALTON O. PARKER, B&B
INVESTMENT GROUP, LLC, AND BW
HOLDINGS LLC**

Case No. 2:23-cv-00482-RJS

Chief Judge Robert J. Shelby

limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual,

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDING, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

Pursuant to the Court's Memorandum Decision and Order issued March 18, 2024, Doc. 275, Defendants Benjamin F. Daniels, Mark W. Schuler, Alton O. Parker, B&B Investment Group, LLC, and BW Holdings, LLC (collectively, the "**FAIR Project Defendants**") submit this Petition for Attorneys Fees and Costs and ask this Court to order Plaintiff Securities and Exchange Commission to pay the FAIR Project Defendants attorneys fees and costs incurred to date in this action arising from the TRO and appointment of the Receiver, in the amount of \$169,070.00

This amount is proper and reasonable considering the issues presented in this action and the TRO and expedited discovery required therein. The factual basis for this request is set forth

and explained in the accompanying Affidavit of Attorneys Fees and Costs and the exhibit attached thereto.

DATED this 17th day of April 2024.

CLYDE SNOW & SESSIONS

/s/ Keith M. Woodwell

Keith M. Woodwell
Thomas A. Brady
Katherine E. Pepin

*Attorneys for Defendants Benjamin F.
Daniels, Mark W. Schuler, Alton O. Parker,
B & B Investment Group, LLC, and BW
Holdings, LLC d/b/a the “FAIR Project”*